

Exhibit F

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESAL PRICE
LITIGATION

MDL No. 1456
Master File No. 1:01-CV-12257-PBS
Sub-Category Case No. 1:08-CV-11200

THIS DOCUMENT RELATES TO:
*United States ex rel. Linnette Sun and Greg
Hamilton, Relators*
v.
*Baxter Hemoglobin Therapeutics and Baxter
International Inc.*

Judge Patti B. Saris

DECLARATION OF LARRY GUIHEEN


I, Larry Guiheen, declare as follows:

1. I am over the age of 21, under no disability, and am competent to testify to the matters contained in this verification. I make this verification in support of Baxter International Inc's Reply In Support of Its Motion to Dismiss Relators' Complaint.
2. I am the President of Baxter Healthcare Corporation's U.S. BioScience Biopharmaceuticals business. Baxter Healthcare Corporation is a subsidiary of Baxter International Inc., One Baxter Parkway, Deerfield, IL 60015-4533.
3. I have been employed by Baxter since 1978 and have held my current title since 1997.
4. I have been authorized by Baxter International Inc. to give this declaration on its behalf.
5. At various times from approximately 2003 to 2006, I met with Greg Hamilton in his capacity as an employee of Baxter customers Express Scripts and CuraScript.
6. To the extent any of these conversations involved pricing, Mr. Hamilton and I discussed only the prices that Express Scripts and CuraScript would pay for Baxter therapies.
7. I never discussed the pricing of Advate with Mr. Hamilton, other than the prices Express Scripts and CuraScript would pay for Advate.
8. At no time did Baxter change its price for Advate based on recommendations from Mr. Hamilton.
9. Advate was approved for sale by the FDA on July 28, 2003, and this was the first day that Baxter sent any information to First DataBank regarding Advate. The first sale of Advate in the United States was on August 20, 2003.

10. I never discussed Average Wholesale Prices (AWP), Wholesale Acquisition Cost (WAC), or Best Prices with Mr. Hamilton.
11. At no time did I discuss pricing strategies with Mr. Hamilton, nor did I ever make any pricing decisions based on his suggestions.

I verify, under penalty of perjury, that that facts set forth herein are true and correct to the best of my knowledge, information, and belief.

Executed on Sep 30 2009


Larry Guiheen